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14 ATTORNEYS FOR WASHOE COUNTY

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 * * *

18 MARY LOHNES, an individual,

19 Plaintiff,

20 vs.

21 WASHOE COUNTY, a public agency, and
22 DOES I-X,

23 Defendants.

24 Case No. 3:19-cv-00287-MMD-WGC

25 **STIPULATION TO LIFT DISCOVERY**
STAY AND
SCHEDULING ORDER

26 **SPECIAL SCHEDULING REVIEW**
REQUESTED

19 The parties, through counsel, stipulate to lift the discovery stay and submit a proposed
20 discovery plan and scheduling order for the Court's approval pursuant to the Case Management
21 Conference held on January 30, 2020 (ECF No. 21).

22 **I. STIPULATION**

23 **A. RECITALS**

24 1. On July 7, 2019, the Court entered a Scheduling Order that was submitted by the
25 parties in compliance with LR 26-1 with a discovery cut-off of December 23, 2019 (ECF No. 7).

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1 2. On October 21, 2019, the Court vacated and held in abeyance the scheduled deadlines,
2 due to a pending settlement conference (ECF No. 12).

3 3. On December 19, 2019, the parties held an Early Neutral Evaluation (ENE) session on
4 before Magistrate Judge Carla Baldwin. The parties were unable to negotiate a settlement at that
5 time. However, the parties agreed to continue the ENE until April 6, 2020 (ECF No. 19).

6 4. On January 30, 2020, the Court conducted a Case Management Conference. The Court
7 accepted the parties' proposal to lift the stay of discovery and submit a discovery plan and
8 scheduling order for the Court's approval (ECF No. 21)

9 **B. DISCOVERY PLAN**

10 Counsel for the parties have conferred and discussed the matters required by FRCP 26(f)
11 and LR 26-1. The following Discovery Plan has been stipulated by the parties:

- 12 1. Discovery Cut-off: Discovery shall be completed on or before August 5, 2020.
- 13 2. Motions to Amend the Complaint and add parties: Motions shall be filed on or before
14 May 5, 2020.
- 15 3. Expert Disclosure: Deadline to disclose direct experts shall be on or before June 5,
16 2020. Disclosure of rebuttal experts shall occur within 30 days after the date on which
17 the corresponding direct expert disclosures were made, and no later than July 6, 2020.
- 18 4. Dispositive motions: Dispositive motions shall be filed on or before September 8,
19 2020.
- 20 5. Pretrial Order: The deadline for filing a joint pretrial order shall be October 5, 2020.
21 However, this deadline shall be stayed in the event a dispositive motion is filed, in
22 which case the joint pretrial order shall be filed 30 days after the Court issues any
23 order on such dispositive motion.
- 24 6. Pretrial Disclosures: Pretrial disclosures required by FRCP 26(a)(3) and any
25 objections thereto shall be included in the pretrial order.

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7. Alternative dispute resolution: The parties certify that they have met and conferred about the possibility of using alternative dispute resolution processes.
8. Alternative Forms of Case Disposition. The parties certify that they considered consent to trial by a magistrate judge and the use of the Short Trial Program.
9. Electronic Evidence: A jury has been demanded and the parties have discussed the presentation of evidence to jurors in an electronic format. The parties agree to enter stipulations regarding the presentation prior to filing the joint pretrial order.

CHRISTOPHER J. HICKS
Washoe County District Attorney

Dated February 4, 2020

By /s/ Herbert B. Kaplan
HERBERT B. KAPLAN
Deputy District Attorney

Dated February 4, 2020

By /s/ Mary Kandaras
MARY KANDARAS
Deputy District Attorney

DOYLE LAW OFFICE PLLC

Dated February 4, 2020

By /s/ Kerry Doyle
KERRY DOYLE, ESQ.
Approved for Electronic Signature

IT IS SO ORDERED.

DATED: February 4, 2020

William G. Cobb
U.S. MAGISTRATE JUDGE